



SeafoodTrade Strategy - NOAA Service Account &lt;seafoodtrade.strategy@noaa.gov&gt;

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**RFI Response: Interagency Seafood Trade Task Force**1 message

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Fri, Jul 31, 2020 at 3:45 PM

To: "SeafoodTrade.Strategy@noaa.gov" &lt;SeafoodTrade.Strategy@noaa.gov&gt;

On behalf of Catfish Farmers of America (CFA), I write to provide brief comments regarding *Recommendations for a Comprehensive Interagency Seafood Trade Strategy* (Doc. 2020-14938).

CFA represents catfish farmers, processors, feed mills, researchers, and suppliers of U.S. Farm-Raised Catfish across the United States. Our organization is a non-profit trade association that was formed in 1968 and is the United States' strongest aquaculture organization. The catfish industry's annual value exceeds \$356 million.

Our industry was pleased to see the Executive Order signed on May 7<sup>th</sup>, which in part created a Seafood Trade Task Force. This comprehensive effort could be a great start to shrinking the extensive seafood trade deficit between the U.S. and our global competitors. Below, please find our response to the relevant question asked in the Federal Register:

*6. Are there other issues that affect the competitiveness of your product in foreign markets? Please specify.*

More than 90% of seafood consumed in the U.S. is imported. American seafood is at a huge disadvantage against cheap, low quality, subsidized seafood imports. The U.S. has an annual trade deficit of \$40 billion with Vietnam and more than \$419 billion with China, two of the larger exporters of seafood to the U.S. With their lax labor, health and environmental standards, countries such as these have a built-in price advantage against U.S. products.

In order to increase exports of seafood to global markets, we must first protect our markets from unsafe and unfair competition here in the U.S. Unsafe, government subsidized seafood products are dumped by the millions of tons in the U.S. every year. Less than 2% of seafood imported is inspected by FDA. If we first require imported seafood to meet the same safety standards required by domestic producers, we can level the playing field with unfair foreign competition. Without this critical work, competitiveness in the global seafood market will be unattainable for U.S. producers.

Our farmers are the safest, most efficient aquaculture producers in the world. On a leveling playing field, they can and will compete with anyone. The Seafood Trade Taskforce should make recommendations to require imported seafood to meet our standards. This alone will do more to reduce the seafood deficit than any other action.

Thank you for the opportunity to provide brief comments on this important subject. We look forward to the Taskforce's important work and stand ready to assist.

Sincerely,

Chad Causey

On Behalf of Catfish Farmers of America